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LaTonya/Pam –

As you all know EJ coordinators and EJ stakeholders have been providing recommendations regarding integrating EJ into emergency response since Katrina. It sounds like Region 6 is taking a lot of those recommendations in the Harvey response.

Here is information that was provided to the EJ Coordinators regarding how Region 6 is integrating EJ into Emergency Response.

You may find it informative to flip through on the plane ride down.

R6 EJ and CIC staff know you are coming and will be looking out for you.

Safe travels.

Thanks,

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Building a Cadre of EJ Response Facilitators for Emergency Management

DRAFT

Building a Cadre of EJ Response Facilitators for Emergency Management

This document outlines steps to enhance the effectiveness of EPA's emergency response functions to ensure such efforts are inclusive, fair, and responsive in addressing community concerns about environment and public health. EPA's traditional disaster/emergency response role primarily has been responding to the threat and impacts from the release of hazardous materials, along with addressing the impacts on community water and wastewater systems. After recent emergency response efforts (each of which occurred in different parts of the country with different circumstances and with varying levels of responsiveness to vulnerable populations), EPA recognized the need for more proactive consideration of the concerns of environmental justice communities during emergency response operations.

Following the April 2010 Deep Water Horizon oil spill, EPA deployed staff to the Gulf to serve as a liaison officer for environmental justice. Similarly, following the aftermath of October 2012 Superstorm Sandy, staff was again deployed to the region to facilitate identifying and responding to the concerns of underserved and overburdened communities. EJ staff liaisons had varying levels of effectiveness during the responses due to a lack of a clear and agreed-to role and function in the overall response structures. These limitations played out once again during the Flint drinking water response.

The Agency has been evolving its practice over the last decade to account for these limitations. In January 2016, the Office of Emergency Management (OEM) revised EPA's Incident Management Handbook for the Incident Command System (ICS) to include the following responsibilities for three key leadership positions (KLP):

- **Incident Commander (IC)** [7-3d]: "Ensure adequate resources are devoted to Liaison staff to assure that environmental justice and tribal issues receive appropriate attention."
- **Public Information Officer (PIO)** [7-5o-p]: "Ensure that community relations activities are effectively coordinated with other Command and General Staff functions. This includes outreach, in coordination with the Command Staff Liaison Officer, to vulnerable populations during the course of the response in collaboration with regional environmental justice and tribal offices. Ensure the community input feedback and issues are effectively coordinated with the LNO."
- **Liaison Officer (LNO)** [7-7m]: "Ensure environmental justice issues are addressed in a timely manner and briefed to the Incident Commander/Unified Command as necessary."

Later in 2016, the Agency issued *EPA Order 2010, Crisis Communications Plan*, which states that community outreach is a vital component of the Agency's overarching communications strategy during a response. Response-specific Crisis Communication Plans identify several key communication considerations that are to be specifically addressed by agency PIOs during an incident, including community engagement, a commitment to language access obligations, and environmental justice. The Order notes that Agency's community involvement coordinators are highly experienced in determining what environmental messages are important to the public and whether key messages are being disseminated to the public in an understandable, timely, accurate and consistent manner. The Plan also establishes that the Agency will assess limited English proficient populations and needs and develop information that addresses environmental justice factors.

These have been important improvements to the integration of environmental justice and the consideration of the needs of vulnerable populations during an emergency response. A more explicit inclusion of environmental justice considerations into EPA's emergency management processes would build on previous recommendations provided to, and improvements already implemented by, the Agency. The National Environmental Justice Advisory Council's (NEJAC) report, *2005 Gulf Coast Hurricanes and Vulnerable Populations: Recommendations for Future Disaster Preparedness/Response*, called for changes in EPA's emergency response procedures, notably:

- Incorporate an environmental justice function and staffing support in the Incident Command System (ICS) structure
- Develop public participation guidelines for disaster response situations, and promote their adoption and use by relevant emergency response organizations in both the public and private sectors

We believe that the recommendations outlined below will build on these improvements to ensure consistent, coordinated, and effective consideration of environmental justice throughout EPA's emergency response functions over time.

RECOMMENDATIONS

- 1) Incorporate an environmental justice function and staffing support within the ICS structure.** To ensure that environmental justice issues are addressed in a timely manner and briefed to the Incident Commander/Unified Command as necessary, we propose that a Cadre of EJ Response Facilitators be identified throughout the EPA regional and headquarters program offices. These EJ Response Facilitators will assist the LNO and PIO in carrying out their responsibilities. This cadre will be fully trained in accordance with the requirements outlined in the National Incident Management System (NIMS).

The EJ Response Facilitators could reside within either of the following Key Leadership Positions, but ideally would have an identified role within both, especially for responses of greater scope and complexity:

- *Liaison Officer (LNO)*, which has the responsibility for "contributing to the attainment of stakeholder objectives by effectively coordinating with stakeholders and understanding their concerns." EJ Response Facilitators would serve as liaison staff, specifically focusing on coordinating with environmental justice stakeholders. Essential to this task would be to provide forums for stakeholder groups to provide input into the response process, which then would be briefed to the Incident Commander/Unified Command as necessary. On larger, more complex responses where response activities elicit environmental justice interests or concerns, an EJ Response Facilitator could be deployed as an Assistant LNO for Stakeholders.

It should be noted that LNOs are expected to possess a working knowledge of EPA policies, including Agency policies about environmental justice. During a response, however, having a dedicated support staff with the specific lookout for environmental justice issues and populations will greatly enhance EPA's ability to ensure that the needs and concerns of the most vulnerable populations are being adequately included. Given that LNOs are tasked with the information flow between the incident command and other governmental agencies, placing EJ Response Facilitators within the LNO function also will assist with facilitating greater inter- and intra-governmental coordination to protect vulnerable populations.

- *Public Information Officer (PIO)*, under which community relations resides. EJ Response Facilitators would serve as public information staff supporting community relations and public engagement efforts as part of Community Outreach Response Teams (CORT) and/or Community Involvement staff. Additional staff that may be required to carry out community outreach activities will be provided through EPA's Response Support Corps. On larger, more complex responses where response activities elicit environmental justice interests or concerns, EJ Response Facilitators could be deployed as Assistant PIOs for Community Relations focused on assessing stakeholder concerns and environmental justice issues as part of PIO efforts to develop and implement a community relations strategy.

While on the surface these functions appear to overlap, they are different. The Field PIO manages and coordinates a spectrum of public information activities, including community outreach activities, message strategies, and multi-lingual and cultural issues. *This includes outreach to vulnerable populations during the course of the response, in collaboration with the Liaison Officer.* Unlike the PIO who broadcasts information out to the community, the LNO meets with stakeholders to solicit their input and concerns, and provides incident updates and feedback through scheduled meetings and briefings. The LNO is the point of contact for community feedback (including environmental justice concerns) by community involvement staff or others.

Differences	
LNO	PIO
<ul style="list-style-type: none"> Meets with stakeholders to solicit their input and concerns Provides incident updates Holds meetings of selected individuals Provides feedback through meetings 	<ul style="list-style-type: none"> Disseminates information to the community including through community relations specialists or media Updates disseminated information Holds Public meetings Provides community feedback to IC, LNO

2) Training. To support the effort to formally deploy EJ Response Facilitators to assist with a response, as well as to more broadly ensure that environmental justice concerns are effectively considered during a response, the following are suggested:

- A. Develop and conduct environmental justice-specific training module(s) (conducted via online or as part of the KLP or other classroom sessions) for the positions listed below. We anticipate that the development of trainings would be part of a collaborative effort between OEJ and OEM. Senior EPA environmental justice staff (headquarters or regional as appropriate) would assist in delivering these modules.
 - **LNOs and PIOs** with a focus on best practices for ensuring that environmental justice issues/concerns are addressed. These modules should focus on the "how" of engaging and assessing environmental justice concerns. Ideally, the principles and best practices outlined in these modules should be incorporated within the ICS Training Academy courses and exercises.
 - **Community Outreach Response Team (CORT)** members who are deployed to support EPA's mission and provide environmental health and safety information to the public (includes non-governmental and environmental organizations). Largely from the regions, CORT members inform residents of areas impacted by an incident about EPA's involvement, provide health advisories and information, and bring back to the PIO information from the public, such as their priorities and areas of concern. Ideally, the principles and best practices outlined in the modules would be incorporated within region-specific trainings for CORT members.
- B. Ensure that the cadre of EJ Response Facilitators meet minimum training requirements in accordance with NIMS and EPA policy. As such, each EJ Response Facilitator should:
 - Enroll as a member of the appropriate regional or headquarters Response Support Corps (RSC), the Agency's standing resource of EPA volunteers who provide critical support to the Agency during an EPA emergency response. This reserve of EPA employees stands ready to provide whatever is needed, based on their qualifications. Each region and headquarters has its own reserve of RSC members who can be activated when needed to assist with an emergency response.
 - Take required on-line training, attend appropriate orientation training(s). The table below summarizes the required training suggested for EJ Response Facilitators (as identified for those working as LNO or PIO staff). Also listed are optional trainings which individual EJ Response Facilitators may find useful.

- Attend EJ Response Facilitator-specific training, similar to the training for the KLPs as part of the ICS Training Academy. This training should focus on developing consistency while respecting flexibility needed for individual responses during emergency responses, and should incorporate best practices and lessons learned from previous experiences.
- Participate in additional training events, such as Brownbag Lunch presentations, periodic exercises, etc., as offered.

REQUIRED TRAINING	All EJ Response Facilitators	
EPA Response Support Corps (RSC) Orientation	✓	
IS-100.B: Introduction to Incident Command System, ICS-100	✓	
IS-200.B: ICS for Single Resources and Initial Action Incidents, ICS-200	✓	
IS-700.A: National Incident Management System (NIMS) An Introduction	✓	
IS-800 National Response Framework (NRF), An Introduction	✓	
EPA-ICS 300 Intermediate ICS	✓	
EPA-ICS 400 Advanced ICS	✓	
24-Hour HAZWOPER Health and Safety Training (Requires 8-hour annual recertification)	✓	
EJ Response Facilitator-specific training (to be developed)	✓	
OPTIONAL TRAINING	Facilitators assigned to:	
	LNO staff	PIO Staff
Region-specific Community Outreach Response Team (CORT) training/exercises		✓
FEMA IS-505: Religious and Cultural Literacy and Competency in Disaster The course provides emergency management professionals with the religious literacy and competency tools needed to learn how to effectively engage religious and cultural groups and their leaders throughout the disaster lifecycle.	✓	
Local Emergency Planning Committee (LEPC) training (under development)	✓	
FEMA IS-250.a: Emergency Support Function #15 (ESF 15) - External Affairs: A New Approach to Emergency Communication and Information Distribution Basic training about the concept and practical application of ESF 15 Standard Operating Procedures for External Affairs.		✓
FEMA IS-794: External Affairs Program Liaison Course is designed to equip participants with skills needed to perform effectively at the trainee level in their assigned Program Liaison area.	✓	
Regional Emergency Operations Center This webinar describes the function and operation of Regional and Headquarters Emergency Operations Centers. Developed for Response Support Corps (RSC) members in regional offices and at EPA HQ.		✓

C. Develop and conduct training on environmental justice tools for use in emergency management activities, including:

- EJSscreen webinar developed specifically for emergency management staff
- Collaborate with ORD on training on how Community-Focused Exposure and Risk Screening Tool (C-FERST) and Tribal-Focused Environmental Risk and Sustainability Tool (Tribal-FERST) can be used as part of response efforts.

D. Add EJ Response Facilitator certification to Field Readiness profile, as well as offer "environmental Justice" among the list of skills. The certification would be a protected field to be updated by OEJ.

3) Early Assessment. Add a senior EJ staff person to regional and/or headquarters incident management assessment processes, ideally either a Regional EJ Coordinator, their division manager, or a manager from the Office of Environmental Justice. By engaging the EJ team during the pre-response assessment, the Agency can better plan for how it will identify potential environmental justice concerns/issues, or vulnerable populations.

4) Develop and promote the adoption and use of public participation guidelines for disaster response situations by relevant emergency response organizations in both the public and private sectors. As the Agency continues to update and standardize its use of public participation guidelines, it should consider developing relevant guidelines that reflect the unique nature of public engagement during disaster response. Public engagement is not limited to the general public, and includes non-governmental and environmental organizations invested in community resiliency.

- *Public Participation Guidelines:* Review existing guidelines for disaster response to ensure they are reflective of environmental justice considerations. NEJAC recommendations and EPA's policies may be helpful in this review (for example, the NEJAC [Model Guidelines for Public Participation](#), the [EPA Policy on Environmental Justice for Working with Federally Recognized Tribes and Indigenous Peoples](#), etc.).
- *Job Aid:* Develop a supplemental job aid for LNO stakeholder staff and PIO community relations staff that lays out best practices and key steps to ensuring environmental justice concerns are identified and considered.

5) Establish an Environmental Justice Desk within the local Emergency Operations Centers, which would be activated as the need arises. This would another place that an EJ Response Facilitator could serve, particularly in the regional offices where on-site deployment is not critical to ensuring the environmental justice concerns of impacted communities are addressed.

6) Assist the Regions in adjusting their practice, where appropriate, to include environmental justice information in their response action memos.